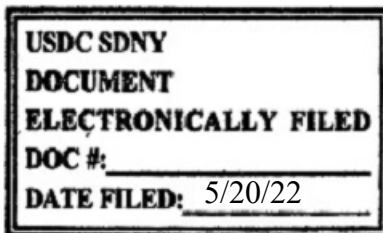




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May 20, 2022

**VIA CM/ECF**

Hon. Barbara C. Moses, U.S.M.J.  
United States District Court  
Southern District of New York  
Courtroom 20A  
500 Pearl Street  
New York, New York 10007

**MEMO ENDORSED**

Re: *Garcia v. W Services Group, et al.*, No. 22 Civ. 01959 (JGK)(BM)

Dear Judge Moses:

We represent Lorena Garcia, the opt-in Plaintiffs, and the putative collective/class members in the above referenced matter. We write this letter along with counsel for W Services Group (“W Services”) and Cleaning Path Corp. and Cinia Ortega (together, the “Cleaning Path Defendants”). The Parties request that the Court grant a brief stay of all case deadlines so that they can devote all resources to settlement discussions before additional litigation costs accrue.

Currently, the deadline for Defendants to answer or otherwise respond to the Complaint is May 23, 2022 (W Services) and June 2, 2022 (Cleaning Path Defendants). In this same vein, the Court has set a pre-trial conference on June 7, 2022 to address Plaintiff’s Pre-Motion Letter Regarding Corrective Notice.

There is good cause to grant this brief stay. Granting the stay would allow the Parties to devote all of their resources towards reviewing records and holding settlement discussions (including with a mediator if deemed necessary). At present, Plaintiffs are set to receive informal production of payroll and other records necessary to determine global damages. To date, no scheduling order has been entered in this matter.

The Defendants have agreed to toll the FLSA statute of limitations for putative collective members for the 60 days that the stay would be in place. This is the first request for a brief stay, although the pre-trial conference has been previously adjourned due to first a scheduling conflict and then undersigned counsel’s exposure to COVID-19.

We thank the Court for its time and consideration of our request.

Application GRANTED in part. The May 23, 2022 deadline for W Services Group to respond to the Complaint is extended to **June 22, 2022**. The June 2, 2022 deadline for the Cleaning Path Defendants to respond to the Complaint is extended to **July 5, 2022**. The June 7, 2022 conference is ADJOURNED to **July 11, 2022 at 11:00 a.m.** No later than **July 5, 2022**, the parties shall provide a status update letter regarding the dispute outlined at Dkt. No. 15. SO ORDERED.

Barbara Moses  
United States Magistrate Judge  
May 20, 2022

Sincerely,

/s/ Armando A. Ortiz

Armando A. Ortiz